

### **REMARKS/ARGUMENTS**

The office action of March 25, 2004 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 2-18 and 21 remain pending. Claims 1, 19 and 20 have been canceled without prejudice or disclaimer.

The undersigned inadvertently failed to submit the Supplemental Information Disclosure Statement identified in Applicants' prior Amendment of December 22, 2003. Filed concurrently herewith is a Supplemental Information Disclosure Statement resubmitting the "other publications" originally submitted in the Information Disclosure Statement of June 23, 2003.

Claims 1-3 and 5-21 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which application regards as the invention. Applicants have amended the remaining claims to address the concerns raised in the action and respectfully request withdrawal of this rejection.

A non-substantive amendment to improve the clarity of claims 4, 6, 7, 12 and 17 has been made.

Claims 1-3 and 19-21 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. patent no. 6,585,776 to Bates et al. ("Bates"). Applicants respectfully traverse this rejection. The action alleges that Bates shows all the elements of claims 1-3 and 19-21. The rejection of claims 1, 19 and 20 is moot as these claims have been canceled.

To show the claim 2 feature of the display format of the link being based upon an examination of the content of a target document associated with the link, the action relies on col. 6, lines 13-44. Contrary to the action's assertion however, Bates neither teaches nor suggests that the display format of the link is based upon an examination of the content of a target document associated with the link. Instead, Bates scans for hypertext link definitions in the host document and determines whether each definition relates to an internal link or external link. Col. 6, lines 33-40. If the link is determined to be an internal link, then a direction for the internal link is determined by comparing the position of the target and the link definition. Col. 6, lines 51-53; Fig. 4 block 78. Also, the absolute and/or relative position of the target referenced in the internal link definition may be determined by comparing the positions of the target and link definition.

Col. 6, lines 57-59; Fig. 4, block 80. After the direction and/or position information are determined, the display attributes for the internal hypertext link definition are set. Col. 7, lines 26-29; Fig. 4, block 82. In view of the above, clearly Bates does not teach or suggest that the display format of the link is based upon *an examination of the content* of a target document associated with the link. Hence, claim 2 is patentably distinct from Bates.

To show the claim 3 feature that the link has a property indicating the display update latency of the link, the action points to col. 4, lines 28-44. Inspection of the cited passage reveals nothing remotely related to a link having a property indicating *the display update latency* of the link. Thus, Bates is wholly devoid of a teaching or suggestion of the claim 3 combination of features.

To show the claim 21 feature that the link relates a spot in a document page with an executable object, the action contends that Fig. 6 of Bates suggests such a feature in that the “when the user clicks on link 114, the system executes ‘introduction’ to display its contents”. Applicants respectfully disagree. Bates does not teach or suggest that target 114 is anything more than the target for internal definition 112. Namely, nothing occurs when a user clicks on target 114. Thus, claim 21 is patentably distinguishable from Bates.

Claims 4-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bates in view of U.S. patent no. 6,038,598 to Danneels (“Danneels”). Applicants respectfully traverse this rejection.

In rejecting independent claim 4, the action incorporates the rejection of claim 1 and acknowledges that Bates does not teach or suggest performing the steps of:

in response to activation of a first link by a user, navigating to a document page and displaying the document page in a first display format;

in response to activation of a second link by a user, the second link being different than the first link and linking to the same [document] page linked to by the first link, navigating to the linked-to document page and displaying the document page in a second display format, the second display format being different than the first display format.

To overcome these deficiencies, the action relies on Danneels and particularly col. 5, lines 5-49. According to Danneels, a user operating a client system requests a web page from a server by specifying a URL. Col. 5, lines 5-7; Fig. 2, steps 106. The server determines the web page set

associated with the specific URL and evaluates conditions of the web page set based on a current state information database entry corresponding to the URL. Col. 5, lines 7-11; Fig. 2, steps 108, 110. Alternatively, the conditions may be set in the user's browser program and transferred to the state information database at the server. Col. 5, lines 24-25. In an example described in Danneels, the conditions represent a choice of language (e.g., German) for presentation of text in a set of web pages. After evaluating the conditions, if the conditions are met (e.g., German), the entry page of the selected web page set meeting the conditions (e.g., German page) is transferred to the client system for viewing. Col. 5, lines 13-18; Fig. 2, steps 112, 116. If the conditions are not met (e.g., English, not German), another web page set (e.g., German) is evaluated to determine if it meets the conditions and the process continues as shown in Fig. 2. Col. 5, lines 19-22. Fig. 2, steps 112, 120, 110.

Contrary to the action's assertion, Danneels as described does not provide a teaching or suggestion of in response to *activation of a second link* by a user, *navigating to the linked-to document page* as recited in claim 4. Danneels merely describes a user requesting a web page from a server by specifying a URL where predetermined conditions are used to determine which web page set associated with the URL meets the conditions and should be returned. Nowhere does Danneels contemplate navigating to the linked-to document page in response to activation of a second link.

Moreover, the action relies on Bates to show a first display format depending upon at least one property of the first link and a second display format depending upon at least one property of the second link as recited in claim 4. Notably, the display formats pertain to display formats of document pages as per a closer reading of the first two steps of claim 4. Bates is wholly devoid of any teaching or suggestion of first and second display formats for pages depending upon at least one property of the first and second links, respectively.

In view of the above, assuming, but not admitting, the combination of Bates and Danneels is proper, it does not result in the claim 4 combination of features.

In rejecting claim 5, the action applies the same rationale used to reject claim 1 with respect to Bates, but seemingly acknowledges that Bates fails to teach or suggest "indicating via at least one link property a display format for at least one of the links on the user content page".

To show this feature, the action refers to the discussion of claim 4. Applicants do not understand this rejection as claim 4 does not call for “indicating via at least one link property a display format for at least one of the links on the user content page”. Thus, applicants do not understand how the action is applying Danneels to claim 5.

In any event, claim 5 calls for, among other features, providing a plurality of user interface document pages to a user, at least one of the user interface document pages having at least a first link. Neither Bates nor Danneels even remotely contemplates much less teaches or suggests user interface document pages and for this further reason, the combination of Bates and Danneels, even if proper, does not result in the claim 5 invention.

Claims 6-18 which ultimately depend from claim 5 are considered patentably distinct from the combination of Bates and Danneels for the same reasons as set forth with respect to their base claim and further in view of the novel and non-obvious features recited therein.

For example, Bates does not teach or suggest displaying, in a display frame associated with a link in a linked-from document page, information about (claim 5) or content of (claim 6) a linked-to document page as recited in claims 5 and 6. Moreover, contrary to the action’s assertion, Bates is wholly devoid of a teaching or suggestion of any of the features additionally recited in claims 7-17. In this regard, applicants have examined Bates including the portions cited by the action and found nothing to remotely suggest the features recited in claims 7-17.

Claim 18, which depends from claim 5, stands rejected under 35 U.S.C. § 103(a) over the combination of Bates and Danneels further in view of U.S. patent no. 6,266,772 to Suzuki (“Suzuki”). Applicants respectfully traverse this rejection.

Suzuki fails to overcome the deficiencies noted above with respect to claim 5. Moreover, applicants have inspected the cited passages of Suzuki applied to show the added feature recited in claim 18 of displaying at least one second link within an e-mail message document page, the at least one second link, *upon activation, causing command code to be executed to perform an operation selected from the group consisting of: reply, reply to all, forward, and delete*. For this further reason, even assuming, but not admitting, that the combination of Bates, Danneels and Suzuki is proper, the combination does not result in the claim 18 invention.

**CONCLUSION**

A Fee Transmittal is attached. If any additional fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

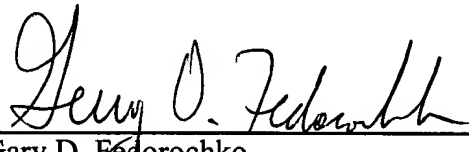
All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same.

Respectfully submitted,

BANNER & WITCOFF, LTD.

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By:

  
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